

1. On or about June 20, 2011, plaintiffs, Herbert Weiss, John Bendokas, Maria Cacia, Donald Curry, Joseph Forman, Theodore Kilkuskie, Albert Neiberg, George Rymar, Joseph Schirmer and Brian Zubatch ("Plaintiffs") commenced this action against Defendants by filing a writ of summons in the Court of Common Pleas of Philadelphia County, No. 110601712.

2. On or about August 12, 2011, Plaintiffs filed a complaint asserting, inter alia, that Defendants committed fraud in violation of the Securities and Exchange Act Section 10(b), 15 U.S.C. § 78j(b) and that Defendants violated the Securities and Exchange Act Rule 10b-5, 17 C.F.R. § 240.10b-5. See Compl. at ¶¶ 83-87. A copy of the complaint is attached hereto as Exhibit "A".

3. Plaintiffs also asserted that Nova Financial Holdings, Inc., Nova Bank and Ballamor Capital Management violated section 20(a) of the Securities and Exchange Act, 15 U.S.C. § 78t(a). See Compl. at ¶¶ 113-120.

4. There have been no other proceedings in this action.

5. In part, Plaintiffs' complaint arises under the laws of the United States because it asserts claims allegedly arising under the Securities and Exchange Act. See Compl. at ¶¶ 83-87, 113-120.

6. As a result, pursuant to the provisions of 28 U.S.C. §§ 1331 and 1441(a), the United States District Court for the Eastern District of Pennsylvania has original jurisdiction over Plaintiffs' claims pursuant to the Securities and Exchange Act.

10. Pursuant to 28 U.S.C. § 1441(a), claims that arise under federal law may be removed to federal court.

11. Pursuant to 28 U.S.C. § 1367(a), this Court may exercise supplemental jurisdiction over Plaintiffs' claims arising under state law.

12. As provided by 28 U.S.C. § 1446(b), Defendants' notice of removal is filed with the Court within thirty (30) days of its receipt, through service or otherwise, of a copy of a pleading from which it may first be ascertained that the case is one which has become removable.

PLEASE TAKE FURTHER NOTICE that, pursuant to 28 U.S.C. § 1446(d), Defendants, upon filing the notice of removal in the Office of the Clerk of the United States District Court for the Eastern District of Pennsylvania, shall promptly file a copy of the notice with the Prothonotary of the Court of Common Pleas of Philadelphia County to effect removal of this action to the United States District Court.

Respectfully submitted,



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Dated: August 23, 2011

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HERBERT WEISS, JOHN BENDOKAS, MARIA
CACIA, DONALD CURRY, JOSEPH FORMAN,
THEODORE KILKUSKIE, ALBERT NEIBERG,
GEORGE RYMAR, JOSEPH SCHIRMER, and
BRIAN ZUBATCH,

Plaintiffs,

v.

NOVA FINANCIAL HOLDINGS, INC., NOVA
BANK, THE KEYSTONE EQUITIES GROUP,
BALLAMOR CAPITAL MANAGEMENT,
BARRY BEKKEDAM, BRIAN M. HARTLINE,
and EDWARD J. DIMARCANTONIO,

Defendants.

CIVIL ACTION

NO.

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing notice of removal to be
served via United States first class mail, postage prepaid, upon:

Keith E. Smith, Esquire
Eckert Seamans Cherin & Mellott, LLC
Two Liberty Place
50 South 16th Street, 22nd Floor
Philadelphia, PA 19102-1909



Amit Shah, Esquire

Dated: August 21, 2011